

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TROY BEARDEN, individually and on behalf
of all persons similarly situated,

Plaintiff,

v.

PRECISION AIR DRILLING
SERVICES, INC.,

Defendant.

Case: 11-cv-1511

Judge Nora Barry Fischer

ELECTRONICALLY FILED

MOTION FOR ADMISSION *PRO HAC VICE*

Now COMES Plaintiff Troy Bearden, by his counsel Shanon J. Carson and Sarah R. Schalman-Bergen, members in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and attorneys with Berger & Montague, P.C., who hereby move this Honorable Court to admit David A. Hughes, *pro hac vice*, for purposes of the above-captioned action, to serve as co-counsel for Plaintiff. In support of this Motion, undersigned counsel states as follows:

1. David A. Hughes is a partner at Hardin & Hughes, LLP, 2121 14th Street, Tuscaloosa, Alabama 35401.

2. Mr. Hughes received his Juris Doctor from the University of Alabama in 1994. He is licensed to practice in, and is a member in good standing of the bar of, the State of Alabama. Mr. Hughes is also admitted to practice before the United States District Court, Northern District of Alabama; United States District Court, Southern District of Alabama and, the United States District Court, Middle District of Alabama.

3. Mr. Hughes has never been subject to any discipline by any court, jurisdiction, or state.

4. Mr. Hughes has read and understands the Local Rules and has stated that he will comply with the Federal Rules of Civil Procedure and the applicable Local Rules.

5. Mr. Hughes certifies that he is a registered user of the Electronic Case Filing system in the United States District Court for the Western District of Pennsylvania.

6. Attached hereto as Exhibit A in support of this Motion is an Affidavit of Attorney David A. Hughes.

7. A proposed Order is attached.

WHEREFORE, the undersigned, a member in good standing of the bar of this Court, respectfully moves this Court to enter an Order admitting David A. Hughes to the bar of this Court, *pro hac vice*.

Dated: November 29, 2011

Respectfully submitted,

BERGER & MONTAGUE, P.C.

s/ Sarah R. Schalman-Bergen
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